



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV 29 2016

OFFICE OF  
AIR AND RADIATION

The Honorable Krysten Sinema  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Congresswoman Sinema:

Thank you for your letter of October 5, 2016, regarding the U.S. Environmental Protection Agency's final rule, "Protection of Stratospheric Ozone: New Listings of Substitutes; Changes of Listing Status; and Reinterpretation of Unacceptability for Closed Cell Foam Products under the Significant New Alternatives Policy (SNAP) Program; and Revision of Clean Air Act Section 608 Venting Prohibition for Propane," signed on September 26, 2016.

The EPA appreciates that Sub-Zero, Inc. and other appliance manufacturers have taken the time to share with us their comments and concerns. How industry stakeholders—especially small manufacturers—will be affected by the final SNAP rule is a key consideration throughout the EPA's rule development process. Since the EPA issued the initial SNAP rule in 1994, the agency has worked closely with industry stakeholders and other federal agencies to list over 400 alternatives for all SNAP sectors and end-uses. This collaboration with industry has helped to ensure that listing decisions are informed by the most current understanding of environmental and human health risks associated with available and potentially available alternatives.

After extensive engagement with our stakeholders, and consideration of comments received from the appliance industry, the EPA established a final change of status date for the final SNAP rule of January 1, 2021, for a number of hydrofluorocarbon refrigerants used in household refrigerators and freezers. This timeline is intended to allow sufficient time for manufacturers to address the technical challenges of designing equipment using alternatives that remain acceptable. It is the Agency's understanding, for example, that some manufacturers have products that already use or can be redesigned to use flammable refrigerants under the existing regulations set by the Underwriters Laboratories (UL) standard for charge size.

The EPA also recognizes manufacturers' interest in the potential for UL standards to be reconsidered and harmonized with European standards. UL is currently reconsidering the charge limits for flammable refrigerants in its standard for household refrigerators and freezers. This is encouraging news, as was the June 2016 announcement by the Department of Energy, the American Society of Heating, Refrigerating, and Air Conditioning Engineers, the Air Conditioning, Heating, and Refrigeration Institute, and the State of California to fund vital research about the properties and uses of flammable refrigerants that could inform industry standards, including UL's. Throughout this transition away from hydrofluorocarbon refrigerants, the EPA will work with industry to provide appropriate technical support.

Again, thank you for your letter. If you have further questions, please contact me or your staff may contact Patricia Haman in the EPA's Office of Congressional and Intergovernmental Relations at [haman.patricia@epa.gov](mailto:haman.patricia@epa.gov) or (202) 564-2806.

Sincerely,

A handwritten signature in blue ink, appearing to read "Janet G. McCabe", with a stylized flourish at the end.

Janet G. McCabe  
Acting Assistant Administrator